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Attorneys for Jeffrey Vetter, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

In re:

SALMA H. AGHA,  
 Debtor.

Case No. 10-16183-A-7

Chapter 7

DC No. [none identified in moving documents]

**DECLARATION OF BARRY L. GOLDNER IN SUPPORT OF CHAPTER 7 TRUSTEE JEFFREY VETTER'S OPPOSITION TO DEBTOR'S MOTION TO DISQUALIFY KLEIN, DENATALE, GOLDNER**

Date: February 5, 2015  
 Time: 9:00 a.m.  
 Place: U.S. Bankruptcy Court  
 1300 18<sup>th</sup> Street, Ste. A  
 Bakersfield, California  
 Judge: Hon. W. Richard Lee

I, BARRY L. GOLDNER, declare:

1. I am a licensed California attorney and partner with Klein, DeNatale, Goldner, Cooper, Rosenlieb & Kimball, LLP ("Klein, DeNatale"). I have practiced with Klein, DeNatale since 1984.

2. In February 2003, Salma H. Khan, M.D., engaged Klein, DeNatale to represent her in a dispute with Froehlich Construction Co, Inc. over the purchase and construction of a residential home. I understand Dr. Khan is the debtor in the bankruptcy proceeding titled above.

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1 and is also known as "Salma H. Agha."

2 3. The dispute for which Klein, DeNatale represented Dr. Khan involved a residential  
3 property commonly referred to as 11622 Harrington Street, Bakersfield, California. Former  
4 Klein, DeNatale attorney Steven Lee and I worked on this matter. Mr. Lee has since relocated to  
5 Utah.

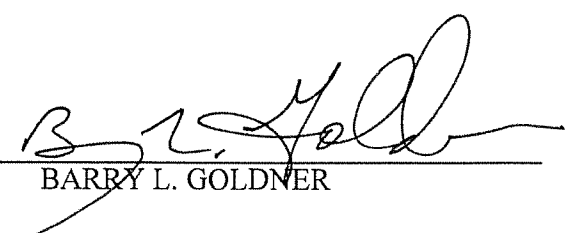
6 4. On May 7, 2003, on behalf of Dr. Khan, Klein, DeNatale filed a complaint for  
7 specific performance, breach of express warranty, breach of implied warranty, and breach of  
8 contract in the case entitled, *Khan v. Froehlich Construction Co., Inc.*, Kern County Superior  
9 Court Case No. 250113.

10 5. In December 2004/January 2005, the case settled by mutual settlement agreement.  
11 Kern County Superior Court entered dismissal of the lawsuit on January 31, 2005, and our  
12 services to the client concluded.

13 6. In 2006, Dr. Khan had an outstanding balance for legal expenses and attorneys'  
14 fees of under \$6,000.00, which Klein, DeNatale agreed to write off.

15 I declare under penalty of perjury under the laws of the United States of America that  
16 the foregoing is true and correct.

17 Dated: January 20 2015

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19 BARRY L. GOLDNER  
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